

1 PHILLIP A. TALBERT
2 United States Attorney
3 ALSTYN BENNETT
4 Assistant United States Attorney
5 501 I Street, Suite 10-100
6 Sacramento, CA 95814
7 Telephone: (916) 554-2700
8 Facsimile: (916) 554-2900
9

10
11 Attorneys for Plaintiff
12 United States of America
13
14

15 IN THE UNITED STATES DISTRICT COURT
16
17 EASTERN DISTRICT OF CALIFORNIA

18 UNITED STATES OF AMERICA,
19 Plaintiff,
20 v.
21 SUKHMANPREET SINGH JAWANDA,
22 Defendant.

23 CASE NO. 2:23-CR-00102-DJC
24 STIPULATION REGARDING EXCLUDABLE
25 TIME PERIODS UNDER SPEEDY TRIAL ACT;
26 FINDINGS AND ORDER
27
28 DATE: November 9, 2023
TIME: 9:00 a.m.
COURT: Hon. Daniel J. Calabretta

19
20
21
22
23
24
25
26
27
28
STIPULATION

29 Plaintiff United States of America, by and through its counsel of record, and defendant, by and
30 through defendant's counsel of record, hereby stipulate as follows:

31 1. By previous order, this matter was set for status on November 9, 2023.
32 2. By this stipulation, defendant now moves to continue the status conference until
33 December 7, 2023, at 9:00 a.m., and to exclude time between November 9, 2023, and December 7,
34 2023, under Local Code T4.

35 3. The parties agree and stipulate, and request that the Court find the following:
36 a) The government has represented that the discovery associated with this case
37 includes investigative reports and related documents in electronic form including approximately
38 180 pages of documents. All of this discovery has been either produced directly to counsel
39 and/or made available for inspection and copying.

b) Counsel for defendant desires additional time to consult with her client, review the current charges, and to discuss potential resolutions with her client. Client is housed outside of Sacramento County and Defense Counsel requires more time to confer with client.

c) Counsel for defendant believes that failure to grant the above-requested continuance would deny her the reasonable time necessary for effective preparation, taking into account the exercise of due diligence.

d) The government does not object to the continuance.

e) Based on the above-stated findings, the ends of justice served by continuing the case as requested outweigh the interest of the public and the defendant in a trial within the original date prescribed by the Speedy Trial Act.

f) For the purpose of computing time under the Speedy Trial Act, 18 U.S.C. § 3161, et seq., within which trial must commence, the time period of November 9, 2023 to December 7, 2023, inclusive, is deemed excludable pursuant to 18 U.S.C. § 3161(h)(7)(A), B(iv) [Local Code T4] because it results from a continuance granted by the Court at defendant's request on the basis of the Court's finding that the ends of justice served by taking such action outweigh the best interest of the public and the defendant in a speedy trial.

111

111

111

111

111

111

111

111

111

111

111

111

1 4. Nothing in this stipulation and order shall preclude a finding that other provisions of the
2 Speedy Trial Act dictate that additional time periods are excludable from the period within which a trial
3 must commence.

4 IT IS SO STIPULATED.

5
6 Dated: November 2, 2023

7 PHILLIP A. TALBERT
United States Attorney

8 _____
9 /s/ ALSTYN BENNETT

10 ALSTYN BENNETT
Assistant United States Attorney

11 Dated: November 2, 2023

12 _____
13 /s/ DINA L. SANTOS

14 DINA L. SANTOS
Counsel for Defendant
SUKHMANPREET SINGH
JAWANDA

15
16 **ORDER**

17 IT IS SO FOUND AND ORDERED this 6th day of November, 2023.

18
19 _____
20 /s/ Daniel J. Calabretta

21 THE HONORABLE DANIEL J. CALABRETTA
UNITED STATES DISTRICT JUDGE